

---

---

# Exhibit 11

---

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
No.: 1:20-CV-05441 (KPF)(KWL)

UNIFORMED FIRE OFFICERS           )  
ASSOCIATION, et al.,               )  
  )  
      Plaintiffs,                    )  
  )  
      vs.                             )  
  )  
BILL de BLASIO, et al.,            )  
  )  
      Defendants.                    )  
\_\_\_\_\_)

REMOTE VIDEOTAPED DEPOSITION OF  
LAURA MELLO  
Friday, August 7, 2020

REPORTED BY:

RHONDA HALL-BREUWET, RDR, CRR, LCR, CCR, FPR

JOB NO. 28094

1 LAURA MELLO

2 BY MR. NORTH:

3 Q Again without breaching privilege,  
4 can you explain to me whether the department  
5 has a concern that the release of  
6 unsubstantiated allegations lodged against  
7 corrections officers could affect the  
8 reputation of those officers?

9 MS. SAINT-FORT: Objection. Asked  
10 and answered and also privileged.

11 You can answer to the extent it  
12 does not infringe on attorney-client  
13 privilege.

14 MR. NORTH: That wasn't the basis  
15 for my question. That was the basis for my  
16 question, and I'm happy to ask again.

17 BY MR. NORTH:

18 Q Without breaching privilege, can  
19 you explain to me whether the department has a  
20 concern that the release of unsubstantiated  
21 allegations lodged against corrections  
22 officers could affect the reputations of those  
23 officers?

24 MS. SAINT-FORT: Objection. Asked  
25 and answered.

1 LAURA MELLO

2 You can answer again.

3 THE WITNESS: It is something that  
4 we are aware is a concern.

5 BY MR. NORTH:

6 Q Without breaching privilege, is  
7 that a concern of the department?

8 A That is something the department  
9 is aware is a concern.

10 Q And in deciding whether  
11 unsubstantiated or unfounded complaints should  
12 be disclosed, has the department considered  
13 whether such disclosure could affect  
14 corrections officers' future employment  
15 opportunities?

16 MS. SAINT-FORT: Objection.  
17 You can answer to the extent it  
18 does not breach attorney-client privilege.

19 THE WITNESS: That's -- the  
20 department is aware that is a concern.

21 BY MR. NORTH:

22 Q Is that a concern of the  
23 department?

24 MS. SAINT-FORT: Objection. Asked  
25 and answered.